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April Mulqueen, Esquire
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Massachusetts Department of Telecommunications and Energy
One South Station, 2nd Floor
Boston, MA 02110

**Re: Request for Waiver of NANPA's Denial of Verizon-MA's Request for
XXXX numbers to serve a large business customer**

Dear Ms. Mulqueen:

The purpose of this letter is to seek a waiver of NANPA's (*i.e.*, NeuStar) decision to deny Verizon Massachusetts' ("Verizon MA") request for XXXX numbers to permit Verizon MA to offer service to a large business customer. Verizon-MA takes such action pursuant to Federal Communications Commission ("FCC") rules [47 C.F.R. 52.15(g)(3)(iv)].

I. NATURE OF NUMBERING REQUEST

One large client, a customer of Verizon MA, requested XXXX telephone numbers in order to provide integrated dialing at a new facility they are moving to in August, 2004. Currently, the Customer utilizes a DID number block of telephone numbers in the XXXX exchange (XXX-XXX-Xxxx). However, that block of numbers will be disconnected with the move to the new facility. As such, the Customer is in need of XXXX consecutive number block, preferably in the Xxxx or Xxxx number series, for this new facility. Verizon MA currently does not have a block of a XXXX consecutive numbers in its inventory for the XXXX exchange. The Customer's request for consecutive numbers is so that its telecommunications systems will continue to be compatible with its other location in XXXX as well as a location in XXXX. The Customer utilizes a 4-digit dialing plan within its three locations in MA. A new exchange will need to be assigned for the new numbers and they need to be consecutive for this and administration purposes. Additionally, in order to be compatible for dialing, the thousand block NXX must end in "6 or 3" and cannot end with a "0", "2", "4", "5", "7" "8" or "9". A copy of the customer letter to Verizon MA indicating the need for the activation of XXXX consecutive numbers and the specific plans of the Customer are outlined in attachment, Exhibit A.

On March 19, 2004, Verizon MA submitted a Central Office Code (NXX) Assignment Request (a “Part 1” form) to the NANPA (NeuStar), requesting one consecutive thousands block to meet the Customer’s needs. The Company explained that it did not have the needed numbers available in its existing inventory in the XXXX rate center. A copy of the “Part 1” form is attached as Exhibit B.

On the same day, NANPA's Central Office Code Administrator denied the Company’s request on the grounds that Verizon MA had not met the rate-center-based MTE criteria, as set forth by the FCC. This denial was based upon not meeting the months-to-exhaust (“MTE”) requirements – notwithstanding the fact that Verizon MA does not have the specific numbering resources needed to satisfy this specific customer’s request. A copy of the e-mail decision denying Verizon MA the code for the Customer is attached as Exhibit C.

Verizon MA submitted the MTE Certification Worksheet required by NANPA, completed in accordance with the Industry Numbering Committee’s Central Office Code (NXX) Assignment Guidelines (“INC Guidelines”). Attached as Exhibit D is the MTE for Verizon MA’s XXX rate center to meet the Customer’s request.

Verizon MA requested the specific consecutive telephone number blocks from NeuStar because it did not have them in its supply of numbers for the XXXX rate center. Attached as Exhibit E is a report from Verizon’s Number Administration Center supporting Verizon MA’s claim that the Customer’s request could not be satisfied with the existing numbering resources in that rate center. Verizon-MA considers Exhibits A through E to be highly competitively sensitive and requests that the Department afford this information proprietary treatment because it contains customer specific data and data relating to number utilization and forecasted growth in the XXXX rate center.

II. REQUEST FOR WAIVER OF NANPA’S NXX CODE DENIAL

By way of this letter, Verizon MA requests that the Department overturn NeuStar’s decision and order that XXXX consecutive telephone numbers ending in 6 or 3 be assigned to Verizon MA’s XXXX central office switch to permit Verizon MA to serve the Customer. The Department has the authority to take such action pursuant to the FCC’s Numbering Resource Optimization (“NRO”) *Third Report and Order and Second Order on Reconsideration* (FCC 01-362), released December 28, 2001, in CC Docket No. 96-98 and CC Docket No. 99-200 (“*Third NRO Order*”).

In the *Third NRO Order, Appendix A, Final Rules, 52.15(g)(4)*, the FCC states:

The NANPA must notify the carrier in writing of its decision to withhold numbering resources within ten (10) days of receiving a request for numbering resources. The carrier may challenge the NANPA’s decision to the appropriate state regulatory commission. The state commission may affirm, or may overturn, the NANPA’s decision to withhold numbering resources from the carrier based on its determination that the carrier has complied

with the reporting and numbering resource application requirements herein. The state commission also may overturn the NANPA's decision to withhold numbering resources from the carrier based on its determination that the carrier has demonstrated a verifiable need for numbering resources and has exhausted all other available remedies.

Further, the FCC states:

We therefore clarify that states may also grant relief if a carrier demonstrates that it has received a customer request for numbering resources in a given rate center that it cannot meet with its current inventory. Carriers may demonstrate such a need by providing the state with documentation of the customer request and current proof of utilization in the rate center.

Third NRO Order at 64. In accordance with applicable FCC rules, Verizon-MA respectfully asks that the Department grant this waiver request so that the Company can continue to serve the Customer.

Thank you for your assistance in this matter. Please contact me at 617-743-9250 if you have any questions concerning this request.

Very truly yours,

Enclosures

cc: Mary L. Cottrell, Secretary
Michael Isenberg, Esq., Telecommunications Director (w/proprietary materials)
Paula Foley, MA DTE (w/proprietary materials)
Service List DTE 01-33

REDACTED